

Before the
Federal Communications Commission
Washington, DC 20554

BELLSOUTH
TELECOMMUNICATIONS, LLC
d/b/a AT&T NORTH CAROLINA and
d/b/a AT&T SOUTH CAROLINA,

Complainant,

v.

DUKE ENERGY PROGRESS, LLC,

Defendant.

Proceeding No. 20-293
Bureau ID No. EB-20-MD-004

RECEIVED
SEP 29 2020
PSC SC
CLERK'S OFFICE

CONSENT MOTION FOR ADJUSTMENT OF DEADLINES

Pursuant to Rules 1.46 and 1.729, 47 C.F.R. §§ 1.46 and 1.729, Complainant BellSouth Telecommunications, LLC d/b/a AT&T North Carolina and d/b/a AT&T South Carolina ("AT&T") respectfully submits this motion requesting that three deadlines applicable to this proceeding be adjusted as set forth below in order to accommodate a defense counsel's requested extension of deadlines in a different FCC pole attachment complaint proceeding, *BellSouth Telecommunications, LLC d/b/a AT&T Florida v. Florida Power and Light Company*, due to unforeseen personal and professional obligations of defense counsel in that proceeding. This request is warranted because counsel and witnesses for AT&T in this proceeding are also involved in the proceeding involving AT&T's Florida affiliate. Defendant Duke Energy Progress, LLC ("Duke") consents to the schedule adjustments requested in this motion.

1. AT&T requests that Duke's November 12, 2020 answer deadline be adjusted to November 13, 2020.

2. AT&T requests that its December 9, 2020 reply deadline be adjusted to December 18, 2020.

3. AT&T requests that Duke's December 16, 2020 deadline to object to interrogatories be adjusted to January 6, 2021.

4. AT&T requests that all other deadlines set forth in the Notice of Complaint issued on September 22, 2020 remain in place.

Respectfully submitted,

Christopher S. Huther
Claire J. Evans
Frank Scaduto
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
(202) 719-7000
chuther@wiley.law
cevens@wiley.law
fscaduto@wiley.law

By: 
Robert Vitanza
Gary Phillips
David Lawson
AT&T SERVICES, INC.
1120 20th Street NW, Suite 1000
Washington, DC 20036
(214) 757-3357

Dated: September 25, 2020

*Attorneys for BellSouth Telecommunications,
LLC d/b/a AT&T North Carolina and d/b/a
AT&T South Carolina*

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2020, I caused a copy of the foregoing Consent Motion for Adjustment of Deadlines to be served on the following (service method indicated):

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9050 Junction Drive
Annapolis Junction, MD 20701
(by ECFS)

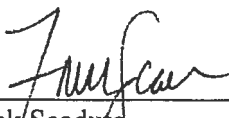
Eric B. Langley
Robin F. Bromberg
Robert R. Zalanka
Langley & Bromberg LLC
2700 U.S. Highway 280, Suite 240E
Birmingham, AL 35223
(by email)

Rosemary H. McEnery
Michael Engel
Federal Communications Commission
Enforcement Bureau
Market Disputes Resolution Division
445 12th Street, SW
Washington, DC 20554
(by email)

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
(by overnight delivery)

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699
(by overnight delivery)

Public Service Commission of South Carolina
101 Executive Center Drive
Suite 100
Columbia, SC 29210
(by overnight delivery)



Frank Scaduto